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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 23-CR-31-J

CHRISTOPHER BAKER,

Defendant.

**NOTIFICATION OF DISCLOSURE OF JENCKS ACT
MATERIAL AND OTHER WITNESS STATEMENTS TO DEFENDANT'S COUNSEL
PRIOR TO TRIAL AND REQUEST FOR PROTECTIVE ORDER**

Kerry J. Jacobson, Assistant United States Attorney for the District of Wyoming, hereby notifies the Court that the United States will disclose *Jencks Act* and other non-jencks witness material to the Defendant's counsel.

The United States requests an order that defense counsel cannot photocopy and/or disseminate any of the materials being disclosed, including their notes or any other version of reproduction, including electronic dissemination, of the information contained in those materials, produced by the United States to any person, including the Defendant, without written permission of the Court, and that counsel for Defendant shall safeguard the materials and shall promptly delete all electronic versions of the reports and return all hard copies to Assistant United States Attorney,

Kerry J. Jacobson, forthwith at the conclusion of the trial in this matter. In support of said motion the United States hereby states and alleges the following:

1. Disclosure of this material prior to trial limits unnecessary interruptions during the trial;
2. Disclosure of this material prior to trial allows defense counsel to be prepared for cross-examination of the witness; and
3. The non-disclosure by the defense counsel of the material will protect the witness or others mentioned in the material and prohibit interference with ongoing investigations or the obstruction of justice.

WHEREFORE, the United States prays as follows:

That the court order defense counsel not to photocopy and/or disseminate in any way, including electronic versions any of the material produced by the United States to any person, including the Defendant, without written permission from the Court, and that counsel for Defendant shall safeguard the materials and shall promptly delete any electronic version of the materials and return all hard copies to Assistant United States Attorney, Kerry J. Jacobson forthwith at the conclusion of the trial in this matter.

DATED this 26th day of September, 2023.

Respectfully submitted,

NICHOLAS VASSALLO
United States Attorney

By: /s/Kerry J. Jacobson
KERRY J. JACOBSON
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on September 26th, 2023, I served a true and correct copy of the foregoing NOTIFICATION OF DISCLOSURE OF *JENCKS ACT* MATERIAL AND OTHER WITNESS STATEMENTS TO DEFENDANT PRIOR TO TRIAL AND REQUEST FOR PROTECTIVE ORDER, upon counsel of record through the CM/ECF filing system:

/s/ Mikala Dawson

Office of the United States Attorney